

**Prince George's County Public Schools**  
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April 29, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

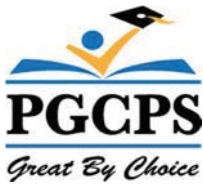
RE: Request for Waiver - Funding Year 2015 FCC Form 471 Filing Deadline  
Prince George's County Public Schools, Upper Marlboro, MD  
Billed Entity Number: 126359  
FCC Form 471 Nos. 996153 and 1024002  
Schools and Libraries Universal Service Support Mechanism  
CC Docket No. 02-6

Dear Ms. Dortch:

Consistent with precedent<sup>1</sup>, Prince George's County Public Schools (PGCPS) requests a waiver of the FY2015 FCC Form 471 application filing window deadline under the E-rate program. The waiver requested is for PGCPS FCC Form 471 applications – 996153, 1024002. The quantitative amount of information and time requirements to navigate the new online filing system and application were substantially greater for Funding Year 2015. PGCPS

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<sup>1</sup> See Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259-60, paras. 8 & 9 (2010) (finding special circumstances exist to justify granting waiver requests where, for example, petitioners filed their FCC Forms 471 within 14 days after the FCC Form 471 filing window deadline; filed their FCC Forms 471 on time, but failed to timely file their certifications; or filed within 30 days despite medical issues); Requests for Waiver and Review of Decisions of the Universal Service Administrator by Anderson Elementary School et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 27 FCC Rcd 5319, 5319-20, para. 2 (Wireline Comp. Bur. 2012) (treating late-filed item 21 attachments like late-filed certifications); Requests for Waiver of Decisions of the Universal Service Administrator by Academy for Academic Excellence et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 22 FCC Rcd 4747, 4749, para. 4 (Wireline Comp. Bur. 2007) (finding special circumstances exist to justify granting waiver requests where petitioners were unable to file on time due to reorganizations, but still filed within a reasonable time); Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ashtabula Area City Schools et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 28 FCC Rcd 4051 (Wireline Comp. Bur. 2013) (dismissing petitions for reconsideration because the petitioners failed to identify any material error, omission, or reason warranting reconsideration, and relied on arguments fully considered and rejected by the Bureau within the same proceeding).



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filed their 471s within 14 days of the window closing and experienced special circumstances worthy of granting a waiver consistent with Federal Communications Commission (FCC) precedent. During the filing window, PGCPS and its consultant experienced technical difficulties, duplication of effort, loss of entered data and material differences between guidance provided in instructions, USAC announcements and actual system performance.

### PLATFORM INSTABILITY, DESIGN ISSUES AND LEVEL OF EFFORT RELATED TO THE USAC ONLINE FILING SYSTEM

During the Funding Year 2015 filing period there were several USAC system limitations, stability and design issues that significantly impacted applicants, specifically PGCPS, level of effort and timeliness of these filings.

#### USAC Issues Untimely Notice of Changes

Applicants were able to utilize the FY2014 FCC Form 470 for services that were to be requested for Funding Year 2015, as the FY2015 FCC Form 470 was not available. On November 20, 2014, USAC announced the deployment of the FY2015 FCC Form 470. The announcement indicated that at 7:00 pm EST the Funding Year 2015 Form 470 would be deployed.<sup>2</sup> USAC indicated, **"If you have started an FY2014 FCC Form 470 online and you have not completed it by 7:00 pm EST tonight, you must start over using the FY2015 version of the form."** Further, USAC indicated, **"If you filed on paper using the FY2014 version of the form and we have not completed data entry of your form by 7:00 pm EST tonight, you will have to file your form online."** PGCPS submits the lack of notice prevented applicants and/or their representatives the ability to efficiently react to USAC's change. PGCPS was informed by our consultant that as a result of this action in excess of sixty (60) FCC Form 470s, including PGCPS, would need to be started over. In addition, USAC's ability to complete data entry of paper forms also impacted applicants and their representatives. All of which required duplicative efforts by applicants or their representatives, an increase in time associated with completion of the FY2015 FCC Form 470, impacting allowable contract dates, available Board meeting dates, contract signings and timely filing of the FCC Form 471.

#### 471 - Funding Year 2015

AUTICS, MATHEMATICS AND SCIENCE ACADEMY - 15SAMS\_C1

Basic Information

Discount Calculation

Funding Requests

Hide this menu

#### Category of Service

of Districts and Library  
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Activity Questions

#### Category of Service ⓘ

What is the category of service for the product and services that you are r

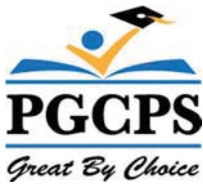
Category 1 ✓

- Telecommunications
- Voice Services
- Internet Access

BACK

NEXT

<sup>2</sup> Universal Service Administrative Company (USAC), "Apply Online Maintenance Tonight Starting at 7:00 PM EST", November 20, 2014, <<http://www.usac.org/sl/tools/news/news-archive.aspx>> (accessed April 27, 2015)

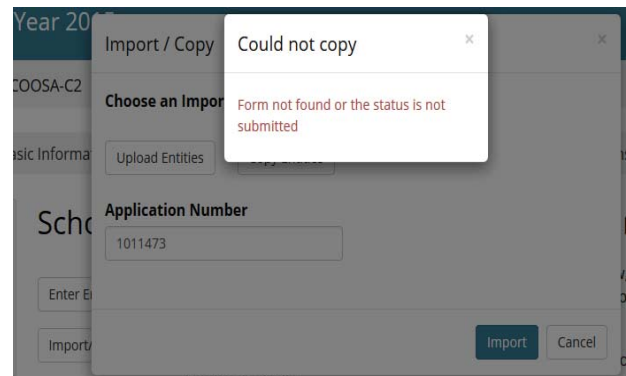


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### Critical Design Challenges in Block 4

Applicants completing the Block 4 in the USAC online system encounter a critical error in the application process if the incorrect category of service button is selected. Applicants are unable to change this selection once it is recorded by the USAC online system. Notwithstanding, no data has been entered into the Block 4, only the category selection has been saved. There was no guidance regarding this critical error in the FY2015 FCC Form 471 Instructions.<sup>3</sup> On April 14, 2015, post-original filing deadline and two days before the extended deadline, USAC provided a Basic Information Tip, "Make sure you choose the correct category of service...",<sup>4</sup> which did not indicate the selection is final and an error will render the application useless for the intended services. The applicant must abandon the application and start a new application to select the correct category of service in the USAC online system. There appears to be no obvious administrative or applicant benefit or simplification in requiring the applicant to duplicate efforts when completing the application due to an inadvertent selection.



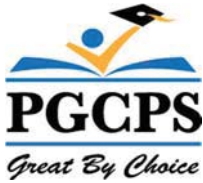
The FY2015 FCC Form 471 Instructions provides guidance for completing the Block 4.<sup>5</sup> The instructions describe "two tools that applicants can use to save time." Relying on the guidance provided in the instructions, PGCPs' consultant attempted to process both applications concurrently. However, during data entry it was determined the "Copy Block 4" time-saving feature referenced in the instructions lacked material information. The online system will only allow the use of this feature if the referenced FCC Form 471 has been submitted.

The significant increase in the level of effort and amount of time to complete both application, substantially contributed to the out of window filing. This is inconsistent with the time saving feature noted in the 471 Instructions and caused applicants to duplicate their efforts or forego the concurrent processing of their applications; neither of which saved time.

<sup>3</sup> Universal Service Administrative Company (USAC), "FCC Form 471 Instructions", October 2014, <http://www.usac.org/res/documents/sl/pdf/forms/471i.pdf> (accessed April 27, 2015)

<sup>4</sup> Universal Service Administrative Company (USAC), "Today's Online FCC Form 471 Filing Tip", April 17, 2015, <http://www.usac.org/sl/tools/news/default.aspx> (accessed April 27, 2015)

<sup>5</sup> FCC Form 471 Schools and Libraries Universal Services Ordered and Certification Form, Instructions for Completing the Schools and Libraries Universal Service Services Ordered and Certification form (FCC Form 471), <http://www.usac.org/res/documents/sl/pdf/forms/471i.pdf>, p. 6.



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### Increased Level of Effort in Block 5

The Funding Request section of the online filing system is substantially more complicated than in previous years. For Funding Year 2014, four (4) hours was the estimated average burden hours to complete the FCC Form 471. For Funding Year 2015 the estimated average burden hours are the same – four (4) hours. We respectfully submit that the Funding Year 2015 burden hours have been underestimated. The PGCPS Priority One FCC Form 471 was 43 pages in funding year 2014; the Funding Year 2015 category one application is a total of 148 pages for the same number of funding requests. The Funding Year 2015 category two application is a total of 146 pages for five (5) funding requests.

### Block 5 Line Item “Time-Out”

The current online system does not provide a “time-out” for inactivity warning to ensure applicants are given an opportunity to save the information entered.<sup>6</sup> The system activity timer appears to be set on the Line item level. It apparently does not recognize activity at the managed entities level within the line item. Accordingly, PGCPS was “timed-out” of the application for inactivity, while actively entering the entities on FRN 2872994. This FRN consists of two (2) line items, both of which include specific cost allocations for 86 entities. The online system indicates the application data is being saved, however the data is not saved. It appears the system is designed to save information once an applicant moves to the next point in the application process. There is a loss of valuable time and effort when an applicant in the process of entering the required information “times-out” for “inactivity”. To prevent further data loss and duplicative time and effort, PGCPS’ consultant entered a portion of the entity cost distribution and periodically saved the information, exited the Line Item to reset the timer and reentered the item again to continue adding the additional entities. Timeout warnings and design improvements to the auto-saving functionality would have substantially reduced the time and effort of duplicating the data entry of pages of entity data in the Block 5.

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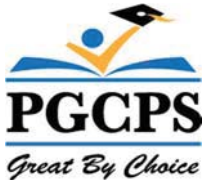
### KEY STAFF MEMBER MEDICAL ISSUE

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In addition to the information presented above, a key staff member of our consulting firm was impaired by a medical issue on April 16, 2015, which resulted in an unavoidable impact on the aforementioned applications. This staff member was directly responsible for the data gathering, analysis and entry of information necessary to complete the FCC Form 471 applications. The extent of this issue resulted in a necessary medical procedure which required sedation on April 17, 2015, the day following the close of the filing window, and requires an additional surgical procedure in the coming weeks to rectify the issue.

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<sup>6</sup> Reference SLD Inquiry #: 22-756441, submitted via the USAC Schools & Libraries Submit a Question Feature at approximately 1:00 AM on April 17, 2015.



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## CONCLUSION

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Prince George's County Public Schools is a large school district serving 128,006 students in the State of Maryland and has a reputation for academic excellence. The E-rate Program resources are an integral part of our success. Although we made every effort to timely submit these applications, unfortunate circumstances – staff and systems issues beyond our control - impeded our efforts.<sup>7</sup>

We applaud the FCC for making the changes necessary to implement the E-Rate Modernization Order, and USAC's efforts to implement the system and procedural changes necessary to make the Funding Year 2015 filing window happen. USAC's Schools and Libraries Division's personnel were charged with the seemingly impossible task of updating systems and revising procedures that had been compiled over the previous 17 years, in a finite time period.

We also hope that the FCC and USAC understand the exponentially increased burden the new requirements placed on applicants, service providers, and consultants alike, and grant this waiver request.

Sincerely,

W. Wesley Watts Jr.  
Chief Information Officer  
Prince George's County Public Schools

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<sup>7</sup> See Requests for Waiver of Decisions of the Universal Service Administrator by Academy for Academic Excellence et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 22 FCC Rcd 4747, 4749, para. 4 (Wireline Comp. Bur. 2007) (finding special circumstances exist to justify granting waiver requests where petitioners were unable to file on time due to reorganizations, but still filed within a reasonable time).